Response for TCEQ Request for BOP Outfall 002 – TPDES WQ0002184000

Update for 8/3

This information is being provided as supplemental to the verbal notification made at 11:37 AM on 8/3/2019 summarizing the discharge made at BOP Outfall 002 between 18:31 and 23:31 on 8/2/2019.

Driven by a rain event experienced in the early evening (approximately 17:00) on 8/2/2019, the BOP Outfall 002 was open and began discharging from 18:31 to 23:31.
Analytical samples were taken at 18:49 and submitted for analysis but results have not been received at this time.

The water discharged was primarily non-process storm water runoff with other permitted sources from within the facility, but may have included some comingled non-contact emergency response (firefighting) water applied to the process area in short durations through the day.

Based on discussions with TCEQ Region 12, this discharge is being evaluated for potential classification as an unauthorized discharge. At the time of this report ExxonMobil believes it does not meet the definition of an unauthorized discharge due to the definition of unauthorized discharge in the permit, TPDES general conditions authorizing discharges from emergency firefighting activities, as well as available water quality results associated with the discharge at the time of this report.

Based on available field and laboratory analytical results received at this time, the discharge was within the acceptable Outfall 002 permit limits. Although the emergency fire water is anticipated to be uncontaminated, more detailed analytical results were collected during the discharge and additional parameters are currently being analyzed. A written 5-Day report will be provided to TCEQ and will incorporate analytical results received at that time.

Discharge start times, stop times, and volume with available analytical results from all discharges beginning 7/31 are included in the attached table. Please note that the units in phenols were misstated in the summary table provided on 8/2/2019. The table has since been updated to correctly identify the laboratory results.

Please note that ExxonMobil provided verbal notification to Mr. Ross Egland (TCEQ Region 12) of Discharge 2 (8/1/2019 17:29 – 23:25) on 8/2 at 13:35 in accordance with BOP TPDES Permit under the Monitoring and Reporting Requirements 7a.

This information is being provided as supplemental to the verbal notification made at 1:30 PM on 8/1/2019, summarizing the comingled stormwater / emergency firefighting water via BOP Outfall 002 discharged between 7/31 16:49 – 8/1 2:23.

On 7/31/2019 the Baytown Olefins Plant (BOP) Propylene Recovery Unit Depropanizer Tower (NT-01), located at 3525 Decker Road in Baytown, TX experienced a fire which resulted in emissions to atmosphere and safe utilization of the flare system.

Based on discussions with TCEQ Region 12, this discharge is being evaluated for potential classification as an unauthorized discharge. At the time of this report ExxonMobil believes it does not meet the definition of an unauthorized discharge due to the definition of unauthorized discharge in the permit, TPDES general conditions authorizing discharges from emergency firefighting activities, as well as available water quality results associated with the discharge at the time of this report.

Based on available field and laboratory analytical results received at this time, the discharge was within the acceptable Outfall 002 permit limits. Although the emergency fire water is anticipated to be uncontaminated, more detailed analytical results were collected during the discharge and additional parameters are currently being analyzed. A written 5-Day report will be provided to TCEQ and will incorporate analytical results received at that time.

Discharge start times, stop times, and volume with available analytical results are included in the attached table.

Please note ExxonMobil will provide verbal notification to TCEQ Region 12 of Discharge 2 (8/1/2019 17:29 – 23:25) in accordance with BOP TPDES Permit under the Monitoring and Reporting Requirements 7a.

	Discharge 1 7/31 16:49 - 8/1 2:23		Discharge 2 8/1 17:29-23:25		Discharge 3 8/2 18:31-23:31
Discharge Sample No.	1	2	3	4	5
Discharge Composition	Rain Water / Emergency FW		Rain Water / Emergency FW / Industrial Water from CT Makeup		Rain Water / Emergency FW / Industrial Water from CT Makeup
Start Time	7/31/2019 16:49	8/1/2019 0:02	8/1/2019 17:29	No Discharge	8/2/2019 18:31
Stop Time	7/31/2019 23:33	8/1/2019 2:23	8/1/2019 23:25	Sample Taken of Retained Water	8/2/2019 23:31
Total Discharge Vol (Mgal)	10.4		7.4	---	2.1
Discharge Segment Vol (Mgal)	8.4	2.0	7.4	---	2.1
Sample Time	16:35 19:24 (BTEX)	0:55	17:29 (O/G, TOC, pH) 19:00 Special Samples	8/2/2019 0:25	8/2/2019 18:49
pH (S.U.)	7.5	7.33	7.7 7.7	7.7	7.85
TOC (mg/L)	5.35	22	5.72 BOP Lab 6.71	5.08 BOP Lab	Pending
O&G (mg/L)	< 3.1	1.3 J	1.2 J	1.4 J	Pending
Benzene (ug/L)	2.7 J	2.09 J	<0.56	<0.56	Pending
Toluene (ug/L)	< 0.550	<0.550	<0.55	<0.55	Pending
Ethylbenzene (ug/L)	< 1.29	< 1.29	<1.29	<1.29	Pending
Xylenes (ug/L)	< 0.93	< 0.93	<0.93	<0.93	Pending
CBOD (mg/L)	---	Pending	Pending	Pending	Pending
TSS (mg/L)	---	77.6	20.8	3.00	Pending
Phenolic Compounds (mg/L)*	---	0.00492 J,B	<0.00276	0.00333 J	Pending
Ammonia as Nitrogen (mg/L)	---	< 0.0254	Pending	Pending	Pending
Nitrate (as N) (mg/L)	---	0.416 F1	0.106 J	0.148 J	Pending
Sulfide (mg/L)	---	0.0311 J,F1	0.0387 F1	<0.0090	Pending
Chromium, Total (ug/L)	---	4.23	1.59 J	0.637	Pending
Chromium, Hex (mg/L)*	---	0.00595 J	0.0072 J	0.0097 J	Pending
PNA Hydrocarbons (ug/L)	---	5.28 J	Pending	Pending	Pending
- acenaphthene	---	< 0.963	Pending	Pending	Pending
- acenaphthylene	---	< 1.17	Pending	Pending	Pending
- anthracene	---	< 0.938	Pending	Pending	Pending
- benzo(a)anthracene	---	< 0.716	Pending	Pending	Pending
- benzo(b)fluoranthene	---	< 0.778	Pending	Pending	Pending
- benzo(k)fluoranthene	---	< 0.407	Pending	Pending	Pending
- benzo(ghi)perylene	---	< 0.827	Pending	Pending	Pending
- benzo(a)pyrene	---	< 0.642	Pending	Pending	Pending
- chrysene	---	< 0.815	Pending	Pending	Pending
- dibenzo(a,h)anthracene	---	< 1.26	Pending	Pending	Pending
- fluoranthene	---	1.54 J	Pending	Pending	Pending
- fluorene	---	< 1.12	Pending	Pending	Pending
- indeno(1,2,3-cd)pyrene	---	< 2.16	Pending	Pending	Pending
- naphthalene	---	< 1.05	Pending	Pending	Pending
- phenanthrene	---	1.58 J	Pending	Pending	Pending
- pyrene	---	2.16 J	Pending	Pending	Pending
Ethylene	---	Pending	Pending	Pending	Pending
Propane	---	Pending	Pending	Pending	Pending
Propylene	---	Pending	Pending	Pending	Pending
Asbestos	---	Pending	Pending	Pending	Pending
Metals (ug/L)	---	---	---	---	---
- aluminum	---	Pending	Pending	Pending	Pending
- antimony	---	6.4	3.53 J	<1.5	Pending
- arsenic	---	5.08	2.75	2.39	Pending
- Barium	---	Pending	Pending	Pending	Pending
- Beryllium	---	0.163 J	<0.103	< 0.103	Pending
- Cadmium	---	0.075 J	0.075 J	0.075 J	Pending
- Chromium, trivalent	---	Pending	Pending	Pending	Pending
- Copper	---	7.41	3.22	1.64 J	Pending
- Cyanide	---	Pending	Pending	Pending	Pending
- Lead	---	4.52	1.67	0.376 J	Pending
- Mercury	---	< 0.103	Pending	Pending	Pending
- Nickel	---	3.55	2.15	1.34 J	Pending
- Selenium	---	<0.315	<0.315	<0.315	Pending
- Silver	---	<0.404	<0.404	<0.404	Pending
- Thallium	---	<0.153	<0.153	<0.153	Pending
- Zinc	---	113 B	83.2 F1,F2	45.6	Pending

*Units of measure corrected from initial Supplemental Discharge Information provided

Qualifier Description

B - Compound was found in the blank and sample.

F1 - MS and/or MSD Recovery is outside acceptance limits.

J - Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

F2 - MS/MSD RPD exceeds control limits